

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON D.C. 20554

In the Matter of)	
)	
American Tower Corporation)	WT Docket No. 05-326
Request for Waiver of)	
47 CFR Section 17.47(b))	

To: Wireless Telecommunications Bureau

COMMENTS OF FLASH TECHNOLOGY
ON REQUEST OF AMERICAN TOWER CORP. FOR WAIVER OF QUARTERLY
INSPECTIONS REQUIRED BY PART 17

Flash Technology¹ ("Flash"), hereby respectfully submits its comments in regards to the Wireless Telecommunications Bureau's ("WTB") *Public Notice* ("Notice") in the above-captioned proceeding.² The Notice seeks comments on American Tower Corporation's ("ATC") request for waiver ("Request") of Section 17.47(b) of the Federal Communications Commission's ("FCC" or "Commission") rules regarding inspection requirements for the owners of any antenna structures.³ Specifically, ATC asks the Commission for permission to perform annual inspections instead of the required quarterly inspections based on the fact that ATC employs an advanced and reliable continual monitoring technology which in effect makes quarterly inspections unnecessary.

¹ Flash Technology is an industry leader in aviation obstruction lighting equipment and monitoring. Flash Technology was founded in 1969 and developed the Eagle™ System to monitor by directly interrogating obstruction lighting in 1994.

² See Wireless Telecommunications Bureau Seeks Comment on the American Tower Corporation Request For Waiver To Perform Annual Inspections In Place Of Quarterly Inspections Required By 47 CFR Section 17.47(b), *Public Notice*, DA 06-139, (rel. Jan. 24, 2006)(*Notice*).

³ 47 CFR Section 17.47(b)

Flash supports the request made by ATC and has verified the data provided to the WTB⁴. The Flash Technology Eagle™ System has operated in tandem with ATC quarterly lighting inspections since March 28, 2002 and to this date no Notice to Airmen (“NOTAM”)-worthy event has been identified as a result of the 43,761 quarterly lighting inspections ATC had completed as of May 16, 2005. The Eagle™ System operates on a dedicated network of computers located at the Alarm Response Center (“ARC”) in Nashville, Tennessee utilized by ATC. When the Eagle™ System detects a problem with the tower lighting system, it immediately contacts the ARC, which is staffed with trained technicians 24 hours per day, 365 days per year.⁵ The Eagle™ System allows the ARC monitoring technicians to immediately report NOTAM-worthy events to Federal Aviation Administration (“FAA”) Flight Service Stations (“FSS”), as well as, automatically reporting both major and minor lighting system alarms to operations personnel of ATC.

It is important to detail the process by which the Eagle™ System is used to monitor ATC lighting systems to fully understand its diagnostic and monitoring functionality. The Eagle™ System communicates with the lighting system in 3 key ways:

1. **Alarm notification.** The lighting system installed at the tower site is equipped with Eagle™ software which contacts the ARC for every type of alarm. These alarms are captured and archived within the Eagle™ Software database and have automated escalations within the ARC to ensure proper diagnostics are conducted within a 30 minute window. Eagle™ documents this data in the database and all information is

⁴ See ATC Supplement (Nov. 14, 2005) in response to the request made by the Wireless Telecommunications Bureau’s Spectrum and Competition Policy Division

⁵ As part of the Flash Technology comments, Flash extends to the Commission Staff a formal invitation to visit the ARC and a tower site to experience first-hand how the Eagle™ System functions.


maintained for 5 years. Within this time frame, the ARC contacts the site and performs full lighting system diagnostics to identify the nature of a lighting failure and to determine if a NOTAM is necessary. If a NOTAM is required, the proper FSS is notified. The Eagle™ System requires a NOTAM number to be entered before the technician can complete his/her task. This number is provided by the FSS verbally. All calls made to the FSS are recorded for accuracy and training purposes.

2. **24 – hour Polling.** The Eagle™ System is programmed to call each and every site once every 24 hours regardless of the independent on-site lighting system notification. This call is automated and runs a full diagnosis of the lighting system. This diagnosis is completed for all lighting phases (i.e. night, day, twilight) regardless of the time of day. This process ensures the lighting system is both working and communicating properly with the Eagle™ System. If any discrepancies are identified the system immediately generates an alarm, triggering the ARC personnel to perform further in depth analysis. The Eagle™ System is programmed to attempt to contact the site up to 11 times if the initial attempt failed. If, by the 11th attempt, contact is not made, the Eagle™ System generates an alarm and an ARC technician attempts to contact the site manually.
3. **Manual Contact.** The Eagle™ System allows for manual diagnoses to take place from any computer. This function allows the ARC, ATC Operations, and ATC compliance persons to contact the tower and review real time operational status of the lighting system.

Flash Technology appreciates the opportunity to support the ATC request for waiver of quarterly lighting inspections and requests that the Commission grant that waiver.

Respectfully submitted,

By:

A handwritten signature in dark ink, appearing to read "Dan Harris", written in a cursive style.

Dan Harris
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